

UNITED STATES DISTRICT COURT  
CENTRAL DISTRICT OF CALIFORNIA

CHROME HEARTS LLC, a Delaware  
Limited Liability Company,

Plaintiff,

vs.

OOMIAY LLC, a California Limited  
Liability Company; SOHEIL  
SASSONIAN, an individual; and DOES  
1-10, inclusive,

Defendants.

CASE NO.: 2:24-cv-00896-MWF(KESx)

**ORDER GRANTING STIPULATION  
RE PERMANENT INJUNCTION**

WHEREAS Plaintiff Chrome Hearts LLC (“Chrome Hearts” or “Plaintiff”) has filed a Complaint in this action against defendants Oomiay LLC and Soheil Sassonian (“Defendants”) alleging Trademark Infringement, False Designations of Origin, Common Law Trademark Infringement and Unfair Competition, and Unfair Competition in Violation of Cal. Bus. & Prof. Code § 17200 *et seq.*, all allegedly arising from Defendants’ manufacture, production, distribution, promotion, advertisement, offering for sale, and/or sale of certain jewelry products bearing identical, substantially indistinguishable, or confusingly similar reproductions of one or more of the Chrome Hearts Marks (attached hereto and incorporated herein as Exhibit 1) (such products will hereinafter be referred to as “Accused Products.”).

1 Several exemplar photographs of the Accused Products are shown in ¶ 28 of the  
2 Complaint and reproduced below in Exhibit 2 for reference.

3 WHEREAS the Parties have entered into a Confidential Settlement Agreement  
4 to fully resolve all of the claims in this action among the Parties;

5 WHEREAS without any admission of liability, Defendants have agreed to  
6 consent to the below terms of a permanent injunction, and it is ORDERED THAT:

7 1. Defendants and their agents, servants, employees and all entities and/or  
8 persons in active concert and participation with Defendant are hereby permanently  
9 restrained and enjoined from infringing upon the Chrome Hearts Marks, including, but  
10 not limited to:

11 a. manufacturing, purchasing, producing, distributing, circulating,  
12 selling, offering for sale, importing, exporting, advertising, promoting, displaying,  
13 shipping, marketing, or otherwise incorporate in advertising or marketing the Accused  
14 Products and/or any other products bearing marks that are identical, substantially  
15 indistinguishable, or confusingly similar to the Chrome Hearts Marks;

16 b. delivering, holding for sale, returning, transferring, or otherwise  
17 moving, storing, or disposing in any manner the Accused Products and/or any other  
18 products bearing marks that are identical, substantially indistinguishable, or  
19 confusingly similar to the Chrome Hearts Marks;

20 c. engaging in any other activity constituting unfair competition with  
21 Chrome Hearts, or acts and practices that deceive consumers, the public, and/or trade,  
22 including without limitation, the use of designations and design elements used or  
23 owned by or associated with Chrome Hearts;

24 d. committing any other act which falsely represents or which has the  
25 effect of falsely representing that the goods and services of Defendant are licensed by,  
26 authorized by, offered by, produced by, sponsored by, or in any other way associated  
27 with Chrome Hearts; and

28 e. knowingly assisting, aiding, or attempting to assist or aid any other

1 person or entity in performing any of the prohibited activities referred to in Paragraphs  
2 1(a)-(d) above; and

3 f. knowingly affecting any transactions, assignments or transfers, or  
4 form new entities or associations to circumvent the prohibitions referred to in  
5 Paragraphs 1(a)-(d) above.

6 WHEREAS the Parties further stipulate to the following, and it is HEREBY  
7 FURTHER ORDERED THAT:

8 2. This Court has jurisdiction over the parties herein and has jurisdiction  
9 over the subject matter hereof pursuant to 15 U.S.C. § 1121.

10 3. The execution of this Stipulation/Order shall serve to bind and obligate  
11 the parties hereto.

12 4. Upon satisfaction of other obligations set forth in the Confidential  
13 Settlement Agreement and Release, the Parties will stipulate to, and Plaintiff will file a  
14 separate *Dismissal with Prejudice of the Civil Action*.


15 5. The jurisdiction of this Court is retained for the purpose of making any  
16 further orders necessary or proper for the enforcement of this Stipulation/Order.

17 6. The Order to Show Cause (Docket No. 34) is **VACATED**.

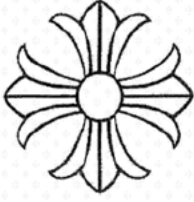
18 7. The parties shall file a stipulated dismissal or a joint status report no later  
19 than **JUNE 20, 2025**.

20 **IT IS SO ORDERED.**

21  
22 Dated: March 20, 2025

23   
24 MICHAEL W. FITZGERALD  
25 United States District Judge  
26  
27  
28

**EXHIBIT 1**

Chrome Hearts' Mark	U.S. Reg. No.	Reg. Date	Goods/Services
 "CH Plus"	3,385,449	02/19/2008	014: Jewelry, namely, bracelets, rings, watch bands, necklaces, and lighters made of precious metals

## EXHIBIT 2



oomiay



### Linked

FREE 440

Size

4 5 6 7 8 9 10 11

What's my ring size?

4 monthly payments

shop

shop

shop

Add to cart

Ships From Our LA Office!

Expected Delivery: Dec 18 - Dec 21

FREE SHIPPING ON ALL ORDERS

FREE STYLE & SIZE EXCHANGES

BUY NOW PAY LATER

30 DAY WARRANTY

UNIQUE STYLES

EARN OOMIAY POINTS ON EVERY PURCHASE

#### Ring Details

- Design: 3 linked stacked rings with gold hoops and cross charm- dual tone
- Metal: 3x dipped 18k yellow gold and 14k white gold over hypoallergenic brass. High quality plating details below
- Crystals: 5A grade Oomiay cubic zirconia crystals